

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE LUCKIN COFFEE INC. SECURITIES
LITIGATION

Case No. 1:20-cv-01293-JPC-JLC

**DECLARATION OF ALEXANDER P. VILLANOVA REGARDING:
(A) MAILING OF THE NOTICE; (B) PUBLICATION OF THE SUMMARY
NOTICE; AND (C) REPORT ON REQUESTS FOR EXCLUSION RECEIVED**

I, Alexander P. Villanova, declare and state as follows, pursuant to 28 U.S.C. § 1746:

1. I am a Senior Project Manager employed by Epiq Class Action & Claims Solutions, Inc. (“Epiq”). The following statements are based on my personal knowledge and information provided by other Epiq employees working under my supervision and, if called on to do so, I could and would testify competently thereto.

2. Pursuant to the Court’s Order Granting Class Representatives’ Stipulation and Order Regarding Dissemination of Class Notice, entered July 6, 2021 (ECF No. 304) (“Notice Order”), Epiq was retained as the Notice Administrator to supervise and administer the notice procedure in connection with the above-captioned litigation (the “Action”). I submit this Declaration in order to provide the Court and the parties to the Action with information regarding the mailing of the Court-approved Notice of Pendency of Class Action (the “Notice”), as well as the publication of the Court-approved Summary Notice of Pendency of Class Action (the “Summary Notice”), and the establishment of the website and toll-free telephone number dedicated to the Action, in accordance with the Court’s Notice Order. I also submit this Declaration to report on the requests for exclusion from the Class received.

MAILING OF THE NOTICE

3. Pursuant to the Notice Order, Epiq was responsible for mailing the Notice to potential Class Members in the Action. A copy of the Notice is attached hereto as Exhibit A. By definition, Class Members are all persons and entities (and their beneficiaries) that purchased or otherwise acquired the American Depositary Shares (“ADSs”) of Luckin Coffee Inc. (“Luckin”) between May 17, 2019 through July 15, 2020, inclusive (the “Class Period”), subject to the exclusions set forth in the Stipulation and Order Regarding Provisional Class Certification for Settlement Purposes dated March 5, 2021 (ECF No. 245).

4. As the large majority of potential Class Members are beneficial purchasers whose securities are held in “street name”—*i.e.*, the securities are purchased by brokerage firms, banks, institutions, and other third-party nominees in the name of the nominee, on behalf of the beneficial purchasers, the Notice requested those who purchased or otherwise acquired Luckin ADSs during the Class Period for the beneficial interest of any person or entity other than themselves to either (i) within seven (7) calendar days of receiving the Notice, provide a list of the names and last known addresses of all such beneficial owners to Epiq for Epiq to mail Notices, or (ii) within seven (7) calendar days of receiving the Notice, request from Epiq sufficient copies of the Notice to forward to all such beneficial owners and within seven (7) calendar days of receipt of those Notices from Epiq, forward them to all such beneficial owners.

5. Epiq maintains and updates a proprietary list of the largest and most common banks, brokers, and other nominees for notice mailings. At the time of the initial mailing, this list contained 1,134 mailing records.

6. Epiq thereafter formatted the Notice and caused it to be printed, personalized with the name and address of each nominee from Epiq’s proprietary list, posted for first-class mail,

postage prepaid, and mailed to nominees on July 13, 2021. On July 13, 2021, a total of 1,134 Notices were mailed to nominees.

7. On July 19, 2021, Epiq received from Defense Counsel two Microsoft Excel files that originated from Luckin's transfer agent containing a list of shareholders of record of Luckin ADSs and a new account list for the period covering May 17, 2019, through July 15, 2020, inclusive. Epiq extracted the names and addresses from these lists and, after data clean-up and de-duplication, there remained 10 unique names and addresses of potential Class Members. Epiq loaded this data into a database created for the Action.

8. Epiq thereafter formatted the Notice and caused it to be printed, personalized with the name and address of each potential Class Member, posted for first-class mail, postage prepaid, and mailed to the potential Class Members. On July 20, 2021, a total of 10 Notices were mailed to these potential Class Members.

9. Epiq has received additional names and addresses of potential Class Members from individuals and nominees, as well as requests from nominees for additional copies of the Notice, in bulk, to forward directly to their customers. Accordingly, after the initial mailings on July 13, 2021 and July 20, 2021 through October 8, 2021, Epiq has mailed an additional 165,058 Notices to potential Class Members whose names and addresses were received from individuals or nominees and another 289,150 Notices, in bulk, to nominees who requested Notices to forward directly to their customers. All such requests have been responded to in a timely manner and Epiq will continue to timely respond to any additional requests received.

10. As of October 8, 2021, an aggregate of 455,352 Notices have been mailed to potential Class Members and nominees by first-class mail.¹

PUBLICATION OF THE SUMMARY NOTICE

11. The Court's Notice Order directed that the Summary Notice be published once in *The Wall Street Journal* and be transmitted over *PR Newswire*. Accordingly, the Summary Notice was published in *The Wall Street Journal* and transmitted over *PR Newswire* on August 5, 2021. Attached as Exhibit B are confirmations of publication, attesting to the publication of the Summary Notice in *The Wall Street Journal* and the transmission of the same over *PR Newswire*.

CALL CENTER SERVICES

12. On July 13, 2021 (the same day that Epiq began mailing Notices), Epiq established and since then has continued to maintain a case-specific, toll-free telephone number (855-535-1824). The toll-free telephone number was set forth in the Notice, Summary Notice, and on the website addressed below.

13. The toll-free telephone number connects callers with an Interactive Voice Recording ("IVR"). The IVR provides potential Class Members and others who call the toll-free telephone number access to pre-recorded information regarding the Action. The toll-free telephone number with pre-recorded information is available 24 hours a day, 7 days a week. Specifically, the pre-recorded message provides callers with a brief summary about the Action, as well as the option to select one of several more detailed recorded messages addressing frequently asked questions about the Action and the Notice. The IVR also allows callers to request that a

¹ Epiq has re-mailed 3,450 Notices to individuals and entities whose original mailings were returned by the U.S. Postal Service ("USPS") and for whom or which updated addresses were provided to Epiq by the USPS or ascertained through a third-party information provider to which Epiq subscribes.

copy of the Notice be mailed to them or the caller may opt to speak live with a trained operator. Live operators are available Monday through Friday from 6:00 a.m. to 6:00 p.m. Pacific Time (excluding official holidays). During other hours, callers may leave a message for an agent to call them back.

WEBSITE

14. Epiq also established and is currently maintaining a website dedicated to the Action (www.LuckinCoffeeSecuritiesLitigation.com) to provide additional information to Class Members and to answer frequently asked questions about the Action. Visitors to the website can download the Notice, as well as other relevant documents (*e.g.*, the Stipulation and Order Regarding Provisional Class Certification for Settlement Purposes, the Consolidated Class Action Complaint, and the Stipulation and Order Regarding Dissemination of Class Notice). The website address was set forth in the Notice and Summary Notice. The website became operational on July 13, 2021, and is accessible 24 hours a day, 7 days a week.

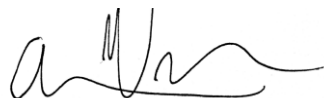
REPORT ON EXCLUSION REQUESTS RECEIVED

15. As set forth in the Notice, Class Members who wished to be excluded from the Class were required to do so in writing so that the request was postmarked by September 17, 2021. As of the date of this Declaration, Epiq has received a total of one hundred and ten (110) requests for exclusion, including one hundred and eight (108) exclusion requests that were postmarked on or before September 17, 2021 and two (2) exclusion requests that were postmarked after that date, but that the Parties have agreed to accept as valid requests for exclusion.

16. Attached as Exhibit C is a list of the names of those who submitted requests for exclusion from the Class.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on October 8, 2021, in Beaverton, Oregon.

A handwritten signature in black ink, appearing to read 'a. Villanova', written above a horizontal line.

Alexander P. Villanova